EXHIBIT B

PRELIMINARY STATEMENT

Pursuant to Federal Rules of Civil Procedure 26(a)(1), Defendants Uber Technologies, Inc. ("Uber") and Ottomotto LLC ("Ottomotto") (collectively, "Defendants") hereby amend and supplement its initial disclosures to Plaintiff Waymo LLC.

Defendants provide these disclosures subject to and without waiving any applicable privilege, doctrine, or right, including without limitation the attorney-client privilege, the joint defense/common interest privilege, the work product doctrine, and all other rights and privileges recognized under the laws of the United States, the State of California, and all relevant jurisdictions. By these disclosures, Defendants do not concede the relevance or admissibility of any particular information. Defendants make these disclosures based on information currently available to them. Defendants reserve the right to amend or supplement these disclosures and to present additional evidence to support their defenses with any filing or during any proceeding in this action, including trial, in accordance with the Court's Case Management Order (Dkt. 562).

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION [Fed. R. Civ. P. 26(a)(1)(A)(i)]

Defendants identify the following individuals who may have discoverable information that Defendants may use to support their defenses in this case. Waymo¹ should contact any current or former employee, agent, or other representative of Defendants only through Defendants' counsel of record, unless otherwise specified. Additionally, individuals described as having knowledge of the "Stroz due diligence for the Uber/Ottomotto acquisition" are noted with an asterisk (*) because these individuals would be used to support Defendants' defenses in this case, or would testify about that subject, if and only if that subject is found not to be privileged.

¹ "Waymo" refers to Waymo LLC (previously Project Chauffeur), Google Inc., and Alphabet Inc.

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1	Persons	Address	Knowledge
2	Travis Kalanick	[Contact through counsel of record]	Defendants' business model
3		Uber Technologies, Inc.	and strategy for autonomous vehicles; Defendants' non-misappropriation of
4		1455 Market Street, Floor 4 San Francisco, CA 94103	Waymo's trade secrets;
5		Sali Fiancisco, CA 94103	Uber's decision to acquire Ottomotto; steps taken by
6			Defendants to prevent trade secrets from prior employers coming to Defendants;
7			Defendants' autonomous vehicle program;
8			March 11, 2016 meeting with Anthony Levandowski;
9			knowledge of Waymo's discussions with Defendants
10			regarding a partnership with Defendants in the self-
11			driving vehicle/ride-sharing space; Defendants'
12			employment of Anthony Levandowski; Defendants'
13			termination of Anthony Levandowski
14	Jeff Holden	[Contact through counsel of record]	Defendants' business model
15		Uber Technologies, Inc.	and strategy for autonomous vehicles; Defendants' autonomous vehicle
16		1455 Market Street, Floor 4 San Francisco, CA 94103	program; Uber's decision to acquire Ottomotto;
17		Sun Francisco, CA 74103	confirmation of the absence of evidence of trade secret
18			misappropriation through and during compliance with
19			and during compliance with the Court's provisional remedy order
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1	Persons	Address	Knowledge
2	Anthony	Contact Mr. Levandowski's counsel:	Nature of employment at
3	Levandowski	Ismail Ramsey or Miles Ehrlich	Waymo and Defendants; design and development of
4		Ramsey & Ehrlich LLP	Defendants' LiDAR; Defendants' autonomous
5		803 Hearst Avenue Berkeley, CA 94710	vehicle program; Defendants' non-
6		Beinetey, erry 1710	misappropriation of Waymo's trade secrets; the
7			inventions disclosed and claimed in the '922 and
8			'464 patents, including conception and reduction to
			practice; the preparation and filing of the '922 and
9			'464 patents; business of Otto Trucking LLC;
10			knowledge of Odin
11			Wave LLC and Tyto LiDAR LLC; Waymo's
12			employee policies concerning confidential and
13			trade secret information, including with respect to
14			hardware; knowledge of the Project Chauffeur bonus
15			program; March 11, 2016 meeting with Anthony
16			Levandowski; Stroz due diligence for the
17			Uber/Ottomotto acquisition*
18	Radu Raduta	Contact Mr. Raduta's counsel:	Nature of employment at Waymo and Defendants;
19		Mary McNamara	Defendants' non- misappropriation of
20		Swanson & McNamara LLP 300 Montgomery Street, Suite 1100	Waymo's trade secrets
21		San Francisco, CA 94104	
22		Phone: (415) 477-3800 Fax: (415) 477-9010	
23		Email: mary@smllp.law	
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1	Persons	Address	Knowledge
2	Sameer Kshirsagar	Contact Mr. Kshirsagar's counsel:	Nature of employment at Waymo and Defendants;
3		Mark Punzalan	Defendants' non-
4		Punzalan Law, P.C.	misappropriation of Waymo's trade secrets
		600 Allerton Street, Suite 201	
5		Redwood City, CA 94063 Phone: (650) 481-8112	
6		Fax: (650) 362-4151	
7		Email: markp@punzalanlaw.com	
8	James Haslim	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
9		Uber Technologies, Inc.	Defendants' non- misappropriation of
10		1455 Market Street, Floor 4 San Francisco, CA 94103	Waymo's trade secrets; knowledge of Odin
11		San Francisco, CA 94103	Wave LLC and Tyto LiDAR LLC; confirmation
12			of the absence of evidence of trade secret misappropriation
13			through and during compliance with the Court's provisional remedy order
14 15	Adam Kenvarg	[Contact through counsel of record]	Design and development of Defendants' LiDAR; Defendants' non-
16		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets;
17 18		San Francisco, CA 94103	confirmation of the absence of evidence of trade secret misappropriation through
19			and during compliance with the Court's provisional
20			remedy order; inspection pursuant to the Court's
21	William Treichler	[Contact through counsel of record]	provisional remedy order Design and development of
22	william Helcinei		Defendants' LiDAR; Defendants' non-
23		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets;
24		San Francisco, CA 94103	confirmation of the absence of evidence of trade secret
25			misappropriation through and during compliance with
26			the Court's provisional remedy order
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1	Persons	Address	Knowledge
2 3 4 5 6 7	Florin Ignatescu	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
8	Gaetan Pennecot	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
9		Uber Technologies, Inc.	Defendants' non-misappropriation of
10		1455 Market Street, Floor 4 San Francisco, CA 94103	Waymo's trade secrets; the inventions disclosed and
11		,	claimed in the '922 and '464 patents, including
12			conception and reduction to practice; the preparation and
13			filing of the '922 and '464 patents; nature of
14			employment at Waymo; Waymo's employee policies
15			concerning confidential and trade secret information,
16			including with respect to hardware; knowledge of the
17			Project Chauffeur bonus program; confirmation of the
18			absence of evidence of trade secret misappropriation
19			through and during compliance with the Court's
20			provisional remedy order
21			

Persons	Address	Knowledge
Daniel Gruver	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; the inventions disclosed and claimed in the '922 and '464 patents, including conception and reduction to
		practice; the preparation and filing of the '922 and '464 patents; nature of
		employment at Waymo; Waymo's employee policies concerning confidential and
		trade secret information, including with respect to
		hardware; knowledge of the Project Chauffeur bonus program; confirmation of the
		absence of evidence of trade secret misappropriation through and during
		compliance with the Court's provisional remedy order
Scott Boehmke	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
	Uber Technologies, Inc. Advanced Technologies Center	Defendants' non- misappropriation of Waymo's trade secrets;
	100 32nd St, Pittsburgh, PA 15201	inspection pursuant to the Court's provisional remedy
		order; confirmation of the absence of evidence of trade secret misappropriation
		through and during compliance with the Court's provisional remedy order
Jim Gasbarro	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
	Uber Technologies, Inc.	Defendants' non- misappropriation of
	Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Waymo's trade secrets; confirmation of the absence
		of evidence of trade secret misappropriation through and during compliance with
		the Court's provisional remedy order

1	Persons	Address	Knowledge
2 3 4 5 6	Robert Doll	[Contact through counsel of record] Uber Technologies, Inc. Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional
7			remedy order
8	Eric Meyhofer	[Contact through counsel of record] Uber Technologies, Inc.	Design and development of Defendants' LiDAR; Defendants' autonomous
10		Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	vehicle program; Defendants' non- misappropriation of
11			Waymo's trade secrets; Defendants' business model and strategy for autonomous
12 13			vehicles; Uber's decision to acquire Ottomotto; termination of Anthony
14			Levandowski; confirmation of the absence of evidence of
15			trade secret misappropriation through and during compliance with the Court's
16			provisional remedy order
17	John Bares	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
18 19		Uber Technologies, Inc. Advanced Technologies Center	Defendants' autonomous vehicle program; Defendants' non-
20		100 32nd St, Pittsburgh, PA 15201	misappropriation of Waymo's trade secrets;
21			Defendants' business model and strategy for autonomous vehicles; Uber's decision to
22			acquire Ottomotto; steps taken by Defendants to
23			prevent trade secrets from prior employers of
24			Defendants' employees coming to Defendants;
25			confirmation of the absence of evidence of trade secret misappropriation through
2627			and during compliance with the Court's provisional
28			remedy order

1	Persons	Address	Knowledge
2	Asheem Linaval	[Contact through counsel of record]	Design and development of
			Defendants' LiDAR; Defendants' non-
3		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of
4		San Francisco, CA 94103	Waymo's trade secrets; Waymo's policies as it
5			relates to contractors concerning confidential and
6			trade secret information; confirmation of the absence
7			of evidence of trade secret misappropriation through
8			and during compliance with the Court's provisional
9			remedy order
10	Michael Karasoff	[Contact through counsel of record]	Design and development of Defendants' LiDAR; Defendants' non-
11		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of
12		San Francisco, CA 94103	Waymo's trade secrets; knowledge of Odin
13			Wave LLC and Tyto LiDAR LLC; confirmation
14			of the absence of evidence of
15			trade secret misappropriation through and during
16			compliance with the Court's provisional remedy order
17	Matthew Palomar	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
18		Uber Technologies, Inc.	Defendants' non- misappropriation of
		1455 Market Street, Floor 4	Waymo's trade secrets; confirmation of the absence
19		San Francisco, CA 94103	of evidence of trade secret
20			misappropriation through and during compliance with
21			the Court's provisional remedy order
22	Daniel Ratner	[Contact through counsel of record]	Design and development of
23		Uber Technologies, Inc.	Defendants' LiDAR; Defendants' non-
24		1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets;
25		San Francisco, CA 94103	confirmation of the absence of evidence of trade secret
26			misappropriation through and during compliance with
27			the Court's provisional remedy order
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Persons	Address	Knowledge
Max Levandowski	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
George Lagui	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

1	Persons	Address	Knowledge
	Lior Ron	[Contact through counsel of record]	Nature of employment at
2		[conditioning counsel of fecting]	Waymo and Defendants;
3		Uber Technologies, Inc.	Anthony Levandowski's departure from Waymo;
4		1455 Market Street, Floor 4 San Francisco, CA 94103	Waymo's policies surrounding side projects and
5		San Francisco, CA 74103	side businesses; knowledge
6			of Waymo employee involvement in side projects and side businesses,
7			including that of Anthony
8			Levandowski; knowledge of the Project Chauffeur bonus
			program; steps taken by Defendants to prevent trade
9			secrets from prior employers
10			of Defendants' employees coming to Defendants;
11			Defendants' non- misappropriation of
12			Waymo's trade secrets;
13			formation, purpose, and business of Otto
			Trucking LLC; formation,
14			purpose, and business of Ottomotto; Ottomotto's
15			decision to be acquired by Uber; March 11, 2016
16			meeting with Anthony
17			Levandowski; Stroz due diligence for the
18			Uber/Ottomotto acquisition*; confirmation of the absence
			of evidence of trade secret
19			misappropriation through and during compliance with
20			the Court's provisional remedy order
21	Brent Schwarz	[Contact through counsel of record]	Defendants' non-
22		Uber Technologies, Inc.	misappropriation of Waymo's trade secrets;
23		1455 Market Street, Floor 4	knowledge of Odin Wave LLC and Tyto LiDAR LLC;
24		San Francisco, CA 94103	confirmation of the absence
25			of evidence of trade secret misappropriation through and during compliance with
26			the Court's provisional remedy order
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1	Persons	Address	Knowledge
2	Cameron Poetzscher	[Contact through counsel of record]	Defendants' non-
3		I They Tasky alogies Inc	misappropriation of Waymo's trade secrets;
4		Uber Technologies, Inc. 1455 Market Street, Floor 4	business of Otto Trucking LLC; Uber's
5		San Francisco, CA 94103	decision to acquire Ottomotto; March 11, 2016
6			meeting with Anthony Levandowski; Stroz due diligence for the
7			Uber/Ottomotto acquisition*; confirmation of the absence
8 9			of evidence of trade secret misappropriation through and during compliance with
10			the Court's provisional remedy order
11	Nina Qi	[Contact through counsel of record]	Defendants' non- misappropriation of
12		Uber Technologies, Inc.	Waymo's trade secrets; business of Otto
13		1455 Market Street, Floor 4 San Francisco, CA 94103	Trucking LLC; Uber's decision to acquire
14			Ottomotto; March 11, 2016 meeting with Anthony
15			Levandowski; confirmation of the absence of evidence of
16			trade secret misappropriation through and during
17			compliance with the Court's provisional remedy order
18	Adam Bentley	[Contact through counsel of record]	Formation, purpose, and business of Otto
19		Uber Technologies, Inc.	Trucking LLC; formation, purpose, and business of
20		1455 Market Street, Floor 4 San Francisco, CA 94103	Ottomotto; Ottomotto's
21		San Francisco, CA 94103	decision to be acquired by Defendants and structure of
22			the acquisition; knowledge of Odin Wave LLC and Tyto
23			LiDAR LLC; submissions to the Nevada Department of
24			Motor Vehicles; Stroz due diligence for the
25			Uber/Ottomotto acquisition*; confirmation of the absence
26			of evidence of trade secret misappropriation through
27			and during compliance with the Court's provisional
28			remedy order

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1	Persons	Address	Knowledge
2	Ognen Stojanovski	[Contact through counsel of record]	Knowledge of Odin Wave LLC, Tyto
3		Uber Technologies, Inc.	LiDAR LLC, and Sandstone Group LLC; confirmation of
4		1455 Market Street, Floor 4 San Francisco, CA 94103	the absence of evidence of trade secret misappropriation
5			through and during compliance with the Court's
6			provisional remedy order
7	Rhian Morgan	[Contact through counsel of record]	Hiring and onboarding process for Ottomotto,
8		Uber Technologies, Inc.	including hiring agreements; steps taken by Defendants to
9		1455 Market Street, Floor 4 San Francisco, CA 94103	prior employers of
10			Defendants' employees coming to Defendants;
11			confirmation of the absence of evidence of trade secret
12			misappropriation through and during compliance with
13			the Court's provisional remedy order
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Defendants' Uber Technologies, Inc. and Ottomotto LLC's Amended Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3:750758

1	Persons	Address	Knowledge
2	Don Burnette	[Contact through counsel of record]	Nature of employment at
3		Liber Technologies Inc	Waymo and Defendants; Defendants' non-
4		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets;
5		San Francisco, CA 94103	formation, purpose, and business of Ottomotto;
6			Ottomotto's decision to be acquired by Defendants;
7			Development and operation of Waymo's autonomous vehicle program; Anthony
8			Levandowski's departure
9			from Waymo; Waymo's policies surrounding side projects and side businesses;
10			knowledge of Waymo employee involvement in
11			side projects and side businesses; knowledge of the
12			Project Chauffeur bonus program; Stroz due diligence
13			for the Uber/Ottomotto acquisition*; confirmation of
14			the absence of evidence of trade secret misappropriation
15			through and during compliance with the Court's
16	C I I 1		provisional remedy order
17	Soren Juelsgaard*	[Contact through counsel of record]	Stroz due diligence for the Uber/Ottomotto acquisition*; Defendants' non-
18		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of
19		San Francisco, CA 94103	Waymo's trade secrets; confirmation of the absence
20			of evidence of trade secret misappropriation through
21			and during compliance with the Court's provisional
22	Colin Sebern*	[Contact through counsel of record]	remedy order Stroz due diligence for the
23			Uber/Ottomotto acquisition*; Defendants' non-
24		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets;
25		San Francisco, CA 94103	confirmation of the absence of evidence of trade secret
26			misappropriation through and during compliance with
27			the Court's provisional remedy order
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1	Persons	Address	Knowledge
2	Brian McClendon	[Contact through counsel of record]	Development and operation
3		Uber Technologies, Inc.	of Waymo's autonomous vehicle program; Waymo's
4		1455 Market Street, Floor 4	employee policies concerning confidential and
5		San Francisco, CA 94103	trade secret information; Waymo's policies
6			surrounding side projects and side businesses; knowledge
7			of Waymo employee involvement in side projects
8			and side businesses, including that of Anthony
9			Levandowski; knowledge of the Project Chauffeur bonus
10			program; introduction of Anthony Levandowski to Defendants; confirmation of
11			the absence of evidence of trade secret misappropriation
12			through and during
13			compliance with the Court's provisional remedy order
14	Justin Suhr	[Contact through counsel of record]	Stroz due diligence for the Uber/Ottomotto acquisition*; Uber's decision to acquire
15		Uber Technologies, Inc. 1455 Market Street, Floor 4	Ottomotto and structure of the acquisition; confirmation
16		San Francisco, CA 94103	of the absence of evidence of
17			trade secret misappropriation through and during
18			compliance with the Court's provisional remedy order
19	Angela Padilla	[Contact through counsel of record]	Termination of Anthony Levandowski; Stroz due
20		Uber Technologies, Inc.	diligence for the Uber/Ottomotto acquisition*;
21		1455 Market Street, Floor 4 San Francisco, CA 94103	confirmation of the absence
22		San Francisco, CA 94103	of evidence of trade secret misappropriation through
23			and during compliance with the Court's provisional
24			remedy order
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Persons	Address	Knowledge
Andrew Glickman	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Stroz due diligence for the Uber/Ottomotto acquisition* Uber's decision to acquire Ottomotto and structure of the acquisition; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Eric Friedberg*	Stroz Friedberg 32 Avenue of the Americas, Floor 4 New York, NY 10013 Phone: (212) 981-6540	Stroz due diligence for the Uber/Ottomotto acquisition
Mary Fulginiti*	Stroz Friedberg 1925 Century Park, East Suite 1350 Los Angeles, CA 90067 Phone: (310) 623-3300	Stroz due diligence for the Uber/Ottomotto acquisition
Judith Branham*	Stroz Friedberg 330 Second Avenue South, Suite 335 Minneapolis, MN 55401 Phone: (612) 605-3000	Stroz due diligence for the Uber/Ottomotto acquisition
Melanie Maugeri*	Stroz Friedberg 101 Montgomery Street, Suite 2200 San Francisco, CA 94104 Phone: (415) 671-4720	Stroz due diligence for the Uber/Ottomotto acquisition
Eric Amdursky*	[Contact through O'Melveny and Myers LLP General Counsel] Martin S. Checov O'Melveny & Myers LLP Two Embarcadero Center, 28th Floor San Francisco, CA 94111 Phone: (415) 984-8713	Stroz due diligence for the Uber/Ottomotto acquisition
Paul Sieben*	[Contact through O'Melveny and Myers LLP General Counsel] Martin S. Checov O'Melveny & Myers LLP Two Embarcadero Center, 28th Floor San Francisco, CA 94111 Phone: (415) 984-8713	Stroz due diligence for the Uber/Ottomotto acquisition

Persons	Address	Knowledge
Eric Tate† ²	Morrison & Foerster LLP 425 Market Street San Francisco, CA 94105 Phone: (415) 268-7000	Stroz due diligence for the Uber/Ottomotto acquisition*; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Rudy Kim†	Morrison & Foerster LLP 755 Page Mill Road Palo Alto, CA 94304 Phone: (650) 813-5600	Intellectual property due diligence for the Uber/Ottomotto acquisition*; inspection pursuant to the Court's provisional remedy order
Shouvik Biswas*†	Morrison & Foerster LLP 1650 Tysons Boulevard, Suite 400 McLean, VA 22102 Phone: (703) 760-7700	Intellectual property due diligence for the Uber/Ottomotto acquisition*
Wendy Ray†	Morrison & Foerster LLP 707 Wilshire Boulevard Los Angeles, CA 90017-3543 Phone: (213) 892-5200	Confirmation of the absence of evidence of trade secret misappropriation; inspection pursuant to the Court's provisional remedy order
Daniel Muino†	Morrison & Foerster LLP 2000 Pennsylvania Avenue, NW Suite 6000 Washington, D.C. 20006 Phone: (202) 887-1500	Inspection pursuant to the Court's provisional remedy order
Esther Kim Chang†	Morrison & Foerster LLP 425 Market Street San Francisco, CA 94105 Phone: (415) 268-7000	Inspection pursuant to the Court's provisional remedy order
Sylvia Rivera†	Morrison & Foerster LLP 707 Wilshire Boulevard Los Angeles, CA 90017-3543 Phone: (213) 892-5200	Confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

² In view of the rapid pace of this litigation and the Court's order requiring initial disclosures by June 21, 2017, Defendants are listing certain outside counsel as potential witnesses out of an abundance of caution. Such outside counsel are indicated with †. Defendants expect to resolve, through resolution of pending privilege issues and discussions with opposing counsel and the Court, whether any of these potential witnesses will in fact be called as witnesses at trial.

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1	Persons	Address	Knowledge
2	Kevin Faulkner	Stroz Friedberg 32 Avenue of the Americas, Floor 4	Forensic examination of Uber-issued devices and
3		New York, NY 10013 Phone: (212) 981-6540	data; confirmation of the absence of evidence of trade
4		Filone. (212) 981-0340	secret misappropriation through and during
5			compliance with the Court's provisional remedy order
6 7	John Krafcik	Waymo LLC 1600 Amphitheatre Parkway	Development and operation of Waymo's autonomous
8		Mountain View, CA 94043	vehicle program; Anthony Levandowski's departure from Waymo; Waymo's
9			policies surrounding side projects and side businesses;
10			knowledge of Waymo employee involvement in
11			side projects and side businesses, including that of
12			Anthony Levandowski; Waymo's business plans; knowledge of discussions
13			with Defendants regarding a partnership with Defendants
14			in the self-driving vehicle/ride-sharing space;
15 16			knowledge of the Project Chauffeur bonus program;
17	Pierre-Yves Droz	Waymo LLC 1600 Amphitheatre Parkway	Inventions disclosed and claimed in the '922, '464,
18		Mountain View, CA 94043	and '936 patents, including conception and reduction to
19			practice; the preparation and filing of the '922, '464, and
20			'936 patents; Waymo's employee policies concerning confidential and
21			trade secret information, including with respect to
22			hardware; the design, development, and operation
23			of Waymo's LiDAR systems, self-driving car
24			project, and purported trade secrets.
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liam McCann Ingram	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043 Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's
n Ingram	1600 Amphitheatre Parkway	operation of Waymo's LiDAR systems, self-driving car project, and purported
		employee policies concerning confidential and trade secret information
nard Fidric	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
te Wachter	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
itri Dolgov	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's
		employee policies concerning confidential and trade secret information;
		Waymo's policies surrounding side projects and side businesses; knowledge
		of Waymo employee involvement in side projects and side businesses, including that of Anthony
	te Wachter	1600 Amphitheatre Parkway Mountain View, CA 94043 The Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043 The Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043

1	Persons	Address	Knowledge
2	Nathaniel Fairfield	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
3		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
4			trade secrets; Waymo's employee policies
5			concerning confidential and trade secret information; Waymo's policies
7			surrounding side projects and side businesses; knowledge
8			of Waymo employee involvement in side projects and side businesses,
9			including that of Anthony Levandowski
10	Andrew Chatham	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
12		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported trade secrets; Waymo's
13			employee policies concerning confidential and
14			trade secret information; Waymo's policies surrounding side projects and
15			side businesses; knowledge of Waymo employee
16 17			involvement in side projects and side businesses,
18			including that of Anthony Levandowski
19	Rahim Pardhan	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
20		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported trade secrets; Waymo's
21			employee policies concerning confidential and
22			trade secret information
23 24	Blaise Gassend	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving
25		moditum view, eri yaoas	car project, and purported trade secrets; Waymo's employee policies
26			concerning confidential and trade secret information
27		•	

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1	Persons	Address	Knowledge
2	Mark Shand	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
3		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported trade secrets; Waymo's
5			employee policies concerning confidential and
6			trade secret information; Waymo's policies
7			surrounding side projects and side businesses; knowledge of Waymo employee
8			involvement in side projects and side businesses,
9			including that of Anthony Levandowski
10	Andrew Schultz	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
12		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported trade secrets; Waymo's
13			employee policies concerning confidential and trade secret information
14	Ryan Andrade	Waymo LLC	Design, development, and
15	Kyan Andrade	1600 Amphitheatre Parkway	operation of Waymo's LiDAR systems, self-driving
16		Mountain View, CA 94043	car project, and purported trade secrets; Waymo's
17			employee policies
18			concerning confidential and trade secret information
19	Drew Ulrich	Waymo LLC 1600 Amphitheatre Parkway	Inventions disclosed and claimed in the '922 and
20 21		Mountain View, CA 94043	'464 patents, including conception and reduction to
21 22			practice; the preparation and filing of the '922 and '464 patents; Waymo's
23			employee policies concerning confidential and
24			trade secret information; the design, development, and
25			operation of Waymo's LiDAR systems, self-driving
26			car project, and purported trade secrets
27			

1	Persons	Address	Knowledge
2	Zachary Morris	Waymo LLC	Inventions disclosed and
3	Zachary Woms	1600 Amphitheatre Parkway Mountain View, CA 94043	claimed in the '922 and '464 patents, including
4		Wouldan View, C/1 94043	conception and reduction to practice; the preparation and
5			filing of the '922 and '464 patents; Waymo's employee policies
6			concerning confidential and trade secret information; the
7			design, development, and operation of Waymo's
8			LiDAR systems, self-driving car project, and purported
9	Samuel Lenius	Warma LLC	trade secrets Invention disclosed and
10	Samuel Lenius	Waymo LLC 1600 Amphitheatre Parkway	claimed in the '936 patent, including conception and
11 12		Mountain View, CA 94043	reduction to practice; the preparation and filing of the
13			⁵ 936 patent; Waymo ⁵ s employee policies concerning confidential and
14			trade secret information; the design, development, and
15			operation of Waymo's LiDAR systems, self-driving
16			car project, and purported trade secrets
17	Ionut Dorel Iordache	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
18		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
19 20			trade secrets; Waymo's employee policies concerning confidential and
			trade secret information
21	Daniel Chu	Waymo LLC 1600 Amphitheatre Parkway	Estimates and forecasts of ride-sharing market and
22		Mountain View, CA 94043	Waymo's share of ride-
23		·	sharing market; Waymo's business and strategic plans
24			(and plans generally) for the
25			ride-sharing market, including projections for
26			revenue generation and profitability
27			

Persons	Address	Knowledge
Gerard Dwyer	Waymo LLC	Estimates and forecasts of
	1600 Amphitheatre Parkway	ride-sharing market and
	Mountain View, CA 94043	Waymo's share of ride-
		sharing market; Waymo's
		business and strategic plans
		(and plans generally) for the
		ride-sharing market, including projections for
		revenue generation and
		profitability
Jennifer Haroon	Waymo LLC	Estimates and forecasts of
Jennier Haroon	1600 Amphitheatre Parkway	ride-sharing market and
		Waymo's share of ride-
	Mountain View, CA 94043	sharing market; Waymo's
		business and strategic plans
		(and plans generally) for th
		ride-sharing market,
		including projections for
		revenue generation and
		profitability
Joanne Chin	Waymo LLC	Waymo's employee policie
	1600 Amphitheatre Parkway	concerning confidential an
	Mountain View, CA 94043	trade secret information;
	,	Waymo's policies
		surrounding side projects a
		side businesses; knowledge
		of Waymo employee
		involvement in side projec and side businesses,
		including that of Anthony
		Levandowski
Gary Brown	Waymo LLC	Waymo's first awareness of
Jary Diown	1600 Amphitheatre Parkway	alleged trade secret
	Mountain View, CA 94043	misappropriation; Waymo
	iviountain view, CA 94043	forensic investigation into
		alleged misappropriation o
		trade secret misappropriati
Michael Janosko	Waymo LLC	Waymo's measures to
	1600 Amphitheatre Parkway	protect the security of
	Mountain View, CA 94043	Waymo's confidential
	,	documents, servers, and
		SVN repository; Waymo's
		employee policies
		concerning confidential and
		trade secret information

Persons	Address	Knowledge
Kristinn Gudjonsson	Waymo LLC	Waymo's measures to
	1600 Amphitheatre Parkway	protect the security of
	Mountain View, CA 94043	Waymo's confidential documents, servers, and
		SVN repository; Waymo's
		employee policies
		concerning confidential and
		trade secret information;
		Waymo's forensic investigation into alleged
		misappropriation of trade
		secret misappropriation
Tim Willis	Waymo LLC	Waymo's supply chain
	1600 Amphitheatre Parkway	operations; Waymo's
	Mountain View, CA 94043	employee policies concerning confidential and
		trade secret information
Sean Noyce	Waymo LLC	Waymo's supply chain
	1600 Amphitheatre Parkway	operations; Waymo's
	Mountain View, CA 94043	employee policies concerning confidential and
		trade secret information
Jai Krishnan	Waymo LLC	Waymo's supply chain
	1600 Amphitheatre Parkway	operations; Waymo's employee policies
	Mountain View, CA 94043	concerning confidential and
		trade secret information
William Grossman	Waymo LLC	Waymo's knowledge of
	1600 Amphitheatre Parkway	Defendants' LiDAR design Waymo's employee policie
	Mountain View, CA 94043	concerning confidential and
		trade secret information;
		Waymo's receipt of
		correspondence containing
Ron Medford	Wayma LLC	Defendants' LiDAR design Waymo's filings,
NOII IVICUIOIU	Waymo LLC 1600 Amphitheatre Parkway	submissions, applications,
	Mountain View, CA 94043	certifications made to publ
	1.20	entities pertaining to its sel
		driving cars and the use of
		lasers in autonomous vehicles

1	Persons	Address	Knowledge
2	Waymo Human	Waymo LLC	Waymo's policies
	Resources Manager	1600 Amphitheatre Parkway	concerning confidential and
3		Mountain View, CA 94043	trade secret information; Waymo employment and
4			compensation issues; Project
5	Cl. 1 D. 1	W. LIC	Chauffeur bonus program Waymo's policies
6	Chelsea Bailey	Waymo LLC 1600 Amphitheatre Parkway	concerning confidential and
		Mountain View, CA 94043	trade secret information;
7		,	Waymo employment and
8			compensation issues; Project Chauffeur bonus program
9	Meiling Tan	Waymo LLC	Marketing of Waymo's
10		1600 Amphitheatre Parkway	autonomous vehicle program; Waymo's business
		Mountain View, CA 94043	plans; Waymo's strategy
11			regarding its business model
12			with respect to self-driving car technology; Waymo's
13			partnerships in the self-
			driving car space; Waymo's
14			business and strategic plans (and plans generally) for the
15			ride-sharing market,
16			including projections for
17			revenue generation and profitability
	Individuals most	Waymo LLC	Development and operation
18	knowledgeable about Waymo's business,	1600 Amphitheatre Parkway	of Waymo's autonomous vehicle program; Waymo's
19	confidentiality	Mountain View, CA 94043	policies surrounding side
20	policies, self-driving vehicle program,		projects and side businesses; knowledge of Waymo
21	LiDAR systems, and		employee involvement in
21	employment and compensation		side projects and side businesses, including that of
22	policies and practices		Anthony Levandowski; the design, development, and
23	practices		operation of Waymo's
24			LiDAR systems and purported trade secrets
		<u> </u>	Parketter trace section
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1	Persons	Address	Knowledge
2	David Krane	Google Ventures 1600 Amphitheatre Parkway	Development and operation of Waymo's autonomous
3		Mountain View, CA 94043	vehicle program; Anthony Levandowski's departure
4 5			from Waymo; Waymo's policies surrounding side projects and side businesses;
6			knowledge of Waymo employee involvement in
7			side projects and side businesses, including that of Anthony Levandowski;
8			Waymo's business plans; knowledge of discussions
9			with Defendants regarding a partnership with Defendants in the self-driving
			vehicle/ride-sharing space
11 12	David Lu	Google Ventures 1600 Amphitheatre Parkway	Development and operation of Waymo's autonomous
13		Mountain View, CA 94043	vehicle program; Anthony Levandowski's departure
14			from Waymo; Waymo's policies surrounding side projects and side businesses;
15			knowledge of Waymo employee involvement in
16			side projects and side businesses, including that of
17			Anthony Levandowski; Waymo's business plans; Waymo's strategy regarding
18			its business model with respect to self-driving car
19			technology; Waymo's business and strategic plans
20			(and plans generally) for the
21			ride-sharing market, including projections for
22			revenue generation and profitability; Waymo's
23			partnerships in the self- driving car space; knowledge
24			of discussions with Defendants regarding a
25			partnership with Defendants in the self-driving
26			vehicle/ride-sharing space
27			

Persons	Address	Knowledge
Larry Page	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; knowledge of the Project Chauffeur bonus program;
Sergey Brin	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski
Eric Schmidt	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Development of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo
David Drummond	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's knowledge of Defendants' autonomous vehicle program; knowledge of Waymo's discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space.

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1	Persons	Address	Knowledge
2	Chris Urmson		Development and operation of Waymo's autonomous
3			vehicle program; Anthony Levandowski's departure from Waymo; Waymo's
5			employee policies concerning confidential and
6			trade secret information; Waymo's policies
7			surrounding side projects and side businesses; knowledge of Waymo employee
8			involvement in side projects and side businesses, including that of Anthony
10			Levandowski; knowledge of the Project Chauffeur bonus program;
11	Bryan Salesky	Argo AI	Development and operation of Waymo's autonomous
12		40 24th Street Pittsburgh, PA 15222	vehicle program; Anthony Levandowski's departure
13			from Waymo; Waymo's employee policies
14			concerning confidential and trade secret information;
15			Waymo's policies surrounding side projects and
16 17			side businesses; knowledge of Waymo employee
18			involvement in side projects and side businesses,
19			including that of Anthony Levandowski
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1	Persons	Address	Knowledge
1 2 3 4 5 6 7 8	Persons Sebastian Thrun	Address Udacity, Inc. 2465 Latham Street Mountain View, CA 94040	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; knowledge of the Project Chauffeur bonus program; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge
9			of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski
11	Jiajun Zhu	Nuro, Inc. 435 N Whisman Road, Suite 100	Development and operation of Waymo's autonomous
12		Mountain View, CA 94043	vehicle program; Anthony Levandowski's departure
13 14			from Waymo; Waymo's employee policies concerning confidential and
15 16			trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge
17			of Waymo employee involvement in side projects and side businesses,
18			including that of Anthony Levandowski
19 20	Dave Ferguson	Nuro, Inc.	Development and operation of Waymo's autonomous
21		435 N Whisman Road, Suite 100 Mountain View, CA 94043	vehicle program; Anthony Levandowski's departure
22			from Waymo; Waymo's employee policies
23			concerning confidential and trade secret information;
24			Waymo's policies surrounding side projects and side businesses; knowledge
25			of Waymo employee involvement in side projects
26 27			and side businesses, including that of Anthony Levandowski
28		<u> </u>	
11	DECEMBANTS' Upen Tech	UNOLOGIES INC. AND OTTOMOTTO LLC'S AMENDED I	AUTHAL DIGGLOCUBES

Persons	Address	Knowledge
Kyle Vogt	Cruise Automation 201 11th Street San Francisco, CA 94103	Public disclosure of Waymo's purported trade secrets
Employee of Velodyne LiDAR, Inc.	5521 Hellyer Avenue San Jose, CA 95138 (408) 465-2800	Public disclosure of Waymo's purported trade secrets
Employee of Quanergy Systems, Inc.	482 Mercury Drive Sunnyvale, CA 94085 (408) 245-9500	Public disclosure of Waymo's purported trade secrets
Employee of Cepton Technologies, Inc.	103 Bonaventura Drive San Jose, CA 95134	Public disclosure of Waymo's purported trade secrets
Employee of Innoviz Technologies Ltd.	15 Atir Yeda Street Kfar Saba, Israel 4464312 Email: info@innoviz.tech	Public disclosure of Waymo's purported trade secrets
Employee of Luminar Technologies, Inc.	495 Old Spanish Trail Portola Valley, CA 94028	Public disclosure of Waymo's purported trade secrets
Employee of Toyota Motor Sales, U.S.A., Inc.	19001 South Western Avenue Department WC11 Torrance, CA 90501 (310) 468-5084	Public disclosure of Waymo's purported trade secrets
Employee of Ford Motor Company	One American Road Dearborn, MI 48126 (313) 322-3000	Public disclosure of Waymo's purported trade secrets
Employee of BMW of North America, LLC	300 Chestnut Ridge Road Woodcliff Lake, NJ 07677-7731	Public disclosure of Waymo's purported trade secrets
Employee of Leddartech USA Inc.	1209 N. Orange Street Wilmington, DE 19801-1120	Public disclosure of Waymo's purported trade secrets
Employee of Phantom Intelligence Inc.	2740, Rue Einstein Québec, QC G1P 4S4 Canada (418) 650-6518	Public disclosure of Waymo's purported trade secrets
Employee of DENSO International America	24777 Denso Drive Southfield, MI 48086 (248) 350-7500	Public disclosure of Waymo's purported trade secrets
Employee of Continental Automotive, Inc.	18030 MacMillan Park Drive Fort Mill, SC 29707 (704) 583-8710	Public disclosure of Waymo's purported trade secrets

1	Persons	Address	Knowledge
2 3	Employee of Valeo Inc.	150 Stephenson Highway Troy, MI 48083	Public disclosure of Waymo's purported trade secrets
	Employee of Suteng	(248) 619-8300 Robosense Building, Block 1	Public disclosure of
5	Innovation Technology Co., Ltd.	South of Zhongguan Honghualing Industrial District	Waymo's purported trade secrets
6		No. 1213 Liuxian Avenue Taoyuan Street, Nanshan District	
7		Shenzhen, China	
8		Phone: 400 6325830 / 0755-86325830 Email: Service@sz-sti.com	
9 10	Employee of		Public disclosure of Waymo's purported trade secrets; communications and business transactions with
11 12			Waymo or Defendants regarding the manufacture of the FAC lens; manufacture, availability, and use of FAC
13			lenses
14 15	Employee of		Public disclosure of Waymo's purported trade secrets; communications and
16			business transactions with Waymo or Defendants regarding the manufacture of the FAC lens; manufacture,
17 18			availability, and use of FAC lenses; use and position of laser diodes on printed circuit boards
19	Employee of Gorilla	Gorilla Circuits	Communications and
20 21	Circuits	c/o CT Corporation 818 W. 7th Street, Suite 930	business transactions with Waymo or Defendants regarding components for
22		Los Angeles, CA 90017	LiDAR sensors; manufacture, availability,
23			and use of such components
24			
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Persons	Address	Knowledge
Employee of Lyft, Inc.	185 Berry Street, Suite 500 San Francisco, CA 94107	Waymo's business plans; Waymo's strategy regarding its business model with respect to self-driving car technology; Waymo's partnerships in the self- driving car space; Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability
John Gardner	c/o Rogers Joseph O'Donnell	Representation of Anthony
	311 California Street, 10th Floor San Francisco, CA	Levandowski; knowledge of Odin Wave LLC, Tyto
		LiDAR LLC, and Sandstone Group LLC; Stroz due
		diligence for the Uber/Ottomotto acquisition*
Alisa Baker	Levine & Baker	Representation of Lior Ron;
	340 Pine St Suite 300, San Francisco, CA 94104	knowledge of Odin Wave LLC, Tyto
	San Panelsco, CA 94104	LiDAR LLC, and Sandstone Group LLC; Stroz due diligence for the
		Uber/Ottomotto acquisition*
Jordan Jaffe†	Quinn Emanuel Urquhart & Sullivan, LLP	Inspection pursuant to the Court's provisional remedy order
	50 California Street, 22nd Floor San Francisco, California 94111	order
	Phone: (415) 875-6600	
Felipe Corredor†	Quinn Emanuel Urquhart & Sullivan, LLP	Inspection pursuant to the Court's provisional remedy
	50 California Street, 22nd Floor	order
	San Francisco, California 94111 Phone: (415) 875-6600	
Jeff Nardinelli†	Quinn Emanuel Urquhart & Sullivan, LLP	Inspection pursuant to the Court's provisional remedy
	50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600	order

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Persons	Address	Knowledge
John McCauley†	Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600	Inspection pursuant to the Court's provisional remedy order
Jared Newton†	Quinn Emanuel Urquhart & Sullivan, LLP 777 6th Street NW, 11th floor Washington, D.C. 20001 Phone: (202) 538-8000	Inspection pursuant to the Court's provisional remedy order

Defendants believe that Waymo's current and former employees and consultants are likely to have knowledge of: (1) the design and development of Waymo's LiDAR and purported trade secrets, including but not limited to failures to protect the confidentiality of such purported trade secrets; (2) the '922, '464, and '936 patents ("the Asserted Patents"); (3) Waymo's analyses or plans concerning the ride-sharing market, including projections for revenue generation and profitability; (4) Waymo's delay in bringing this lawsuit and motivations for litigating against Defendants; (5) Waymo's practice of allowing competing side businesses; and (6) lack of damages or irreparable harm to Waymo. The identities of all such individuals are known to Waymo but not to Defendants as of the date of this disclosure. Defendants reserve the right to supplement this list as additional facts are disclosed in discovery.

Further, Defendants identify the following persons who may have knowledge of facts relevant to this suit:

- 1. Any custodian of records or other person who may be required to establish authenticity of documents;
- 2. Any and all persons identified by Waymo in its initial disclosures; and

³ As set forth in Defendants' motion to compel (Dkt. 687), Waymo has refused to respond to interrogatories or produce documents fundamental to Defendants' defenses, which Uber needs to proceed with depositions. To date, Waymo has produced only 975 documents in response to Defendants' first and second sets of requests for production, consisting of 162 document requests. If and when Waymo fulfills its interrogatory response and document production obligations, Defendants will supplement these disclosures based on information not currently known to Defendants.

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3. Any and all persons whose depositions are taken, who provide written testimony in this action, or who contribute to any response to the parties' discovery requests.

Additionally, Defendants have retained and intend to retain expert witnesses to testify on its defenses, including non-misappropriation of Waymo's alleged trade secrets; the culture, customs, and practices in the autonomous vehicle space; non-infringement; invalidity; forensic investigations to locate the allegedly downloaded files; and lack of damages.

B. DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS [Fed. R. Civ. P. 26(a)(1)(A)(ii)]

Defendants identify the following categories of documents, electronically stored information, and tangible things in its possession, custody, or control that it may use to support its defenses, unless solely for impeachment:

- Documents concerning Defendants' autonomous vehicle program;
- Documents concerning Defendants' design and development of LiDAR;
- Documents concerning Defendants' efforts to commercialize autonomous vehicle technology;
- Drawings or photographs of Defendants' LiDAR;
- Prototypes (or components of prototypes) of Defendants' LiDAR;
- Documents concerning Defendants' hiring process, including hiring agreements;
- Documents concerning Uber's acquisition of Ottomotto;
- The Asserted Patents, their prosecution histories, and prior art to the Asserted Patents;
- Documents in the public domain relating to Waymo's purported trade secrets;
- Documents concerning third-party suppliers of LiDAR components; and
- Waymo's filings, submissions, applications, or certifications made to public entities pertaining to the use of lasers in autonomous vehicles.

To the extent the above-identified documents are within the possession, custody, or control of Defendants, such documents are generally located at Defendants' offices at 1455 Market Street, San Francisco, CA 94103.

Defendants' search for documents is ongoing, and Defendants reserve the right to

1 supplement this disclosure under Federal Rule of Civil Procedure 26(e)(1). Defendants may also 2 rely on documents produced by any party and third party to this litigation, including Defendants 3 themselves and Waymo. 4 Defendants reserve the right to object to the production of any documents described herein 5 on any basis permitted by the Federal Rules of Civil Procedure. 6 C. **COMPUTATION OF DAMAGES** [Fed. R. Civ. P. 26(a)(1)(A)(iii)] 7 Pursuant to Fed. R. Civ. P. 26(a)(1)(C), Defendants may seek attorneys' fees and costs in 8 defending this action, but are unable at this time to estimate the amount. 9 D. **INSURANCE AGREEMENTS** [Fed. R. Civ. P. 26(a)(1)(A)(iv)] 10 Defendants are currently unaware of any insurance contracts applicable to any claim in this action. 11 12 **CERTIFICATION** 13 To the best of my knowledge, information and belief, formed after an inquiry that is reasonable under the circumstances, this disclosure is complete and correct as of the date set forth 14 below. 15 16 17 Dated: June 21, 2017 MORRISON & FOERSTER LLP 18 By: /s/ Michael A. Jacobs 19 MICHAEL A. JACOBS 20 Attorneys for Defendants UBER TECHNOLOGIES, INC. 21 and OTTOMOTTO LLC 22 23 24 25 26 27 28